

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**TAIWAN DICKERSON and KIM  
KING-MACON**

**PLAINTIFFS**

vs.

No. 4:22-cv-519-HEA

**CENTENE MANAGEMENT COMPANY, LLC,  
and CENTENE CORPORATION**

**DEFENDANTS**

**UNOPPOSED MOTION FOR LEAVE FOR PLAINTIFFS TO FILE  
FIRST AMENDED AND SUBSTITUTED COMPLAINT**

Plaintiffs Taiwan Dickerson and Kim King-Macon (“Plaintiffs”), by and through their under signed counsel, and for their Unopposed Motion for Leave for Plaintiffs to File First Amended and Substituted Complaint, they state and allege as follows:

1. Plaintiffs filed their Original Complaint—Collective Action on May 12, 2022. ECF No. 1.
2. Per the Case Management Order – Track 2: Standard (ECF No. 48), all motions for joinder of additional parties or amendment of pleadings in regard to Tiffany Russell only shall be filed no later than October 20, 2023.
3. Plaintiffs hereby asks for leave to file a First Amended and Substituted Complaint (“Amended Complaint”) pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure.
4. The purpose of the Amended Complaint is to add Tiffany Russell as plaintiff and to remove the collective action allegations.
5. The proposed amendment would not prejudice Defendants.

6. Plaintiffs' proposed First Amended and Substituted Complaint is attached hereto as Exhibit 1.

7. Counsel for the Parties have conferred, and **Defendants do not oppose this Motion.**

WHEREFORE, premises considered, Plaintiffs Taiwan Dickerson and Kim King-Macon respectfully request an Order of this Court granting them leave to file the First Amended and Substituted Complaint, and for such other relief as may be just and proper.

Respectfully submitted,

**PLAINTIFFS TAIWAN DICKERSON  
and KIM KING-MACON**

/s/ Josh Sanford  
Josh Sanford  
*Admitted Pro Hac Vice*  
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